

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
PLAINTIFF,

V.

[1] ARMANDO L. ALICEA-SANTIAGO, a/k/a La Mami/Ñañito,
(Counts One through Seven);
[2] JOSE A. CUSTODIO-COLON, a/k/a Gilligan/El Viejo,
(Counts One through Six);
[3] CHRISTOPHER ROMAN-MEDINA, a/k/a Keke,
(Counts One through Six);
[4] ARMANDO ORTIZ-MELELENDEZ, a/k/a Yokain,
(Counts One through Six);
[5] NESTOR MURRAY-VALENTINO, a/k/a Valentino,
(Counts One Through Six);
[6] NICKY COSME-RIVERA, a/k/a Mellao,
(Counts One Through Six);
[7] HECTOR PACHECO-FIGUERAS, a/k/a La H,
(Counts One through Six);
[8] JOSHUA ALMODOVAR, a/k/a Mamaito,
(Counts One Through Six);
[9] ORLANDO COIMBRE-ECHEVARRIA, a/k/a Orlandito,
(Counts One Through Six);
[10] GIOVANNI VARGAS-MALDONADO, a/k/a Jova/La J,
(Counts One Through Seven);

INDICTMENT

FILED UNDER SEAL

CRIMINAL NO. 24-

VIOLATIONS:

(COUNT ONE)

21 U.S.C., §§ 841(a)(1), 846, and 860.

(COUNT TWO)

21 U.S.C. §§ 841(a)(1), 860 and
18 U.S.C. § 2.

(COUNT THREE)

21 U.S.C. §§ 841(a)(1), 860 and
18 U.S.C. § 2.

(COUNT FOUR)

21 U.S.C. §§ 841(a)(1), 860 and
18 U.S.C. § 2.

(COUNT FIVE)

21 U.S.C. §§ 841(a)(1), 860 and
18 U.S.C. § 2.

(COUNT SIX)

21 U.S.C. §§ 841(a)(1), 860 and
18 U.S.C. § 2.

(COUNT SEVEN)

18 U.S.C. § 924(c) and 2

Forfeiture Allegation

21 U.S.C. § 853 and
Rule 32.2(a) F.R.C.P.
18 U.S.C. § 982
28 U.S.C. § 2461(c)

(SEVEN COUNTS)



[11] JON ALVARADO-HERNANDEZ,
a/k/a Jacob,
(Counts One Through Seven);
[12] RAYMOND TORRES-ZAYAS,
a/k/a Macho,
(Counts One Through Six);
[13] EDUARDO APONTE TORRES,
a/k/a Edu/Menor/Bubu,
(Counts One Through Seven);
[14] LUIS LABOY-NADAL, a/k/a
Marlon/Mailon,
(Counts One Through Six);
[15] JUAN LIMARDO-MELENDEZ,
a/k/a JONNY,
(Counts One Through Seven);
[16] JOSE MENDEZ-MORALES, a/k/a
Hugo Boss/Gordo,
(Counts One Through Seven);
[17] BRYANT SANTIAGO-RAMIREZ,
a/k/a Bryant,
(Counts One Through Seven);
[18] EDGARGO CARABALLO-
ECHEVARRIA, a/k/a La J,
(Counts One Through Seven);
[19] JOMAR IRRIZARRY-SARRIERA,
(Counts One Through Six);
[20] NORBERTO MARTINEZ-CASTRO,
a/k/a Berto/Bertito/Enano,
(Counts One Through Six);
[21] EDUARDO NEGRON-PEREZ,
a/k/a Bebo,
(Counts One Through Six);
[22] ADAM MALDONADO-
SANTUCHE,
(Counts One Through Seven);
[23] JOSE VAZQUEZ-VARGAS, a/k/a
Gordo Janet,
(Counts One Through Seven);
[24] KELVIN ALMODOVAR-TORO,
a/k/a Calvo,
(Counts One Through Six);

[25] JAIME PADILLA-GOMEZ, a/k/a Jimito,
(Counts One Through Six);
[26] RAFAEL ALERS-ORTIZ, a/k/a Memin,
(Counts One Through Six);
[27] JOSE A. CUSTODIO-FLORES, a/k/a Gele,
(Counts One Through Six);
[28] JAI LOPEZ-DIAZ, a/k/a Chai,
(Counts One Through Six);
[29] LUIS J. ALVARADO-DE LA CRUZ, a/k/a Joel,
(Counts One Through Six);
[30] JOSHUA RODRIGUEZ-CORTEZ, a/k/a Medusa/Versace,
(Counts One Through Six);
[31] VILMA J. VAZQUEZ-VARGAS, a/k/a Janet,
(Counts One Through Six);
[32] JAY PAGES-PACHECO, (Counts One Through Seven);
[33] HECTOR J. ORENGO-TORRES, a/k/a JAVI,
(Counts One Through Seven);
[34] RAMON ECHEVARRIA-CARABALLO, a/k/a Arabe,
(Counts One Through Seven);
[35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
(Counts One Through Seven);
[36] WILLIAM GONZALEZ-MALDONADO, a/k/a Casqui,
(Counts One Through Seven);
[37] MIGUEL ORTIZ-GONZALEZ, a/k/a Saca Mostro,
(Counts One Through Seven);
[38] JONATHAN VAZQUEZ-BOTA, a/k/a Mama Deo/Jona,
(Counts One Through Seven)
[39] KEVIN COSME-RIVERA,

(Counts One Through Six);
[40] JOSUE PEREZ-TORRES, a/k/a
Aguja,
(Counts One Through Six);
[41] WILSON BERRIOS-FLORES, a/k/a
Panda,
(Counts One Through Seven);
[42] NEFTALY RIVERA-SANTIAGO,
a/k/a Taly,
(Counts One Through Seven);
[43] ANGEL SANTANA-PACHECO,
a/k/a Goldo,
(Counts One Through Six);
[44] WILLIAM RAMOS-RIVERA, a/k/a
Willy,
(Counts One Through Six);
[45] MIGUEL ALEXANDER-BAEZ,
a/k/a Yoyo,
(Counts One Through Seven);
[46] ALEXIS APONTE-NEGRON,
(Counts One Through Six);
[47] CORAL GONZALEZ-BACENET,
(Counts One Through Six);
[48] ANTHONY LIMARDO-
MERCADO, a/k/a Mariachi,
(Counts One Through Six);
[49] ARTURO DE LAHONGRAIS-
EMMANUELLI,
(Counts One Through Six);
[50] SILVERIO YOGUEZ-MERCADO,
a/k/a Gringo,
(Counts One Through Six);
[51] JOVELYN MARQUEZ-RUIZ, a/k/a
La Flaca,
(Counts One Through Six);
[52] MANUEL ALICEA-ALICEA, a/k/a
Alicea,
(Counts One Through Six);
[53] WANDA VARGAS-ALVAREZ,
(Counts One Through Six);

[54] JAIME MENDEZ-ORTIZ, a/k/a
Jimmy,
(Counts One Through Six);
[55] ANGEL MERCADO-ACABEO,
a/k/a Cano/Canito
(Counts One Through Six);
[56] ILIA MARTINEZ-PAGAN, a/k/a
Coral/Charlot,
(Counts One Through Six);
[57] JAYSON CAMACHO-
RODRIGUEZ,
(Counts One Through Six);
[58] MARIA MERCADO-CRESPO,
a/k/a Luly,
(Counts One Through Six);
[59] JADIRA BAEZ-FLORES,
(Counts One Through Six),
[60] JOSE CAMBRELEN-PABON, a/k/a
Buba,
(Counts One Through Six);
DEFENDANTS.

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. §§ 841(a)(1) & (b)(1)(A), 846 & 860
(Conspiracy to Possess with Intent to Distribute and Distribution of Controlled Substances)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
- [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
- [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,
- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,

- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,
- [32] JAY PAGES-PACHECO,
- [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
- [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
- [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
- [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
- [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
- [38] JONATHAN VAZQUEZ-BOTA,
- A/K/A MAMA DEO/JONA,
- [39] WILSON BERRIOS-FLORES, A/K/A PANDA,
- [40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
- [41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
- [42] KEVIN COSME-RIVERA,
- [43] JOSUE PEREZ-TORRES, A/K/A AGUJA,
- [44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,

[45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
[46] ALEXIS APONTE-NEGRON,
[47] CORAL GONZALEZ-BACENET,
[48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
[49] ARTURO DE LAHONGRAIS-EMMANUELLI,
[50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
[51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
[52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
[53] WANDA VARGAS-ALVAREZ,
[54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
[55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
[56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
[57] JAYSON CAMACHO-RODRIGUEZ,
[58] MARIA MERCADO-CRESPO, A/K/A LULY,
[59] JADIRA BAEZ-FLORES, AND
[60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and/or to distribute controlled substances, to wit: in excess of two hundred and eighty (280) grams of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II Narcotic Drug Controlled Substance; in excess of one (1) kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I, Narcotic Drug Controlled Substance; in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance; in excess of one hundred (100) kilograms of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance; 400 grams or more of N-phenyl-N-[1-(2-phenylethyl) -4-piperidinyl] propenamide (fentanyl), a Schedule II Narcotic Drug Controlled Substance; within one thousand (1,000) feet of a real property

comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was the large-scale distribution of controlled substances at the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, and other areas in and nearby the municipality of Ponce, Puerto Rico. All for significant financial gain and profit.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would establish drug distribution points that would move within different areas inside the public housing projects to avoid police detection.
2. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would sell street quantity amounts of heroin, cocaine base (“crack”), cocaine and marijuana at the drug distribution points.
3. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would weigh, “cut,” divide, and package the heroin,

cocaine, crack, and marijuana in distinctive baggies and/or vials in order to prepare the narcotics for sale. The distinctive packaging of user quantity drugs served as a “brand” of drugs, referred to by the gang as a *sello*, or seal.

4. It was further part of the manner and means of the conspiracy that the defendants and their co-conspirators would use two-way radios (“walkie-talkies” or scanners) to communicate with each other and alert one another to the presence of law enforcement agents or members of rival gangs.

5. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would routinely possess, carry, brandish, and use or discharge firearms to protect themselves and their drug trafficking organization.

6. It was further part of the manner and means of the conspiracy that some of the defendants and their co-conspirators would often act as armed “look-outs” at strategically located positions within the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project to alert other co-conspirators of the presence of law enforcement agents and/or protect these areas from rival drug traffickers.

7. It was further part of the manner and means of the conspiracy that members of the drug trafficking organization would use force, violence, including murder and intimidation, to intimidate rival drug trafficking organizations and to discipline members of their own drug trafficking organization. Members of the organization would go to “war” with rival gangs. War with a rival gang at times included retaliatory shooting incidents that,

depending on the specific incident, resulted in no injuries, some injuries, or death. Members of the organization would carry guns with them in public places for defensive and offensive purposes. Leaders of the organization at times would go to public places with other armed co-conspirators for the purpose of physical security and to portray the image of strength and potential violence, which ensured fear and respect in the street and, therefore, the continued viability of profitable drug trafficking within the areas controlled by the gang. All members of the organization knew that the organization was violent. The violent nature of the organization was so widely known that residents of the public housing projects the organization controlled also knew that the organization used violence.

8. It was further part of the manner and means of the conspiracy that some of the co-defendants and their co-conspirators would act in different roles, at times strict roles and at times overlapping roles, in order to further the goals of the conspiracy, to wit: leaders, owners, enforcers, runners, sellers, and facilitators.

9. It was further part of the manner and means of the conspiracy that the leaders used groups of co-conspirators administrating the daily activities of the drug distribution point.

10. It was further part of the manner and means of the conspiracy that that some of the members of the conspiracy would purchase wholesale quantities of narcotics in order to distribute the same in street quantities amounts at their drug distribution points. Some of these narcotics would be sent illegally by mail using the U.S. Postal Service.

11. It was further part of the manner and means of the conspiracy that leaders would meet regularly to discuss drug trafficking activities and prevent issues between the

members of the organization.

ROLES OF THE MEMBERS OF THE CONSPIRACY

12. Leaders directly controlled and supervised the drug trafficking activities at the drug points located within the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project. At various times during the course of the conspiracy, leaders purchased firearms and allowed members of the conspiracy to carry such firearms and ammunition in order to protect the drug distribution activities.

13. “Owners” were members of the organization who had some right within the organization to the profits from a particular drug point or a “brand” (*sello*) of drugs at that drug point. All owners were also leaders, although not every leader was an owner. Some owner-leaders were incarcerated, but gave instructions and reaped profits of drug sales from prison. Incarcerated owner-leaders would enjoy the profits either personally for things like purchasing food at the commissary of the prison or the purchase of illegal phones, or the incarcerated owners would direct drug profits to their family members in the community. Incarcerated leaders would use both the official phones provided by prison facilities to manage the drug trafficking organization or would use illegal cell phones smuggled into prison to manage the gang.

14. “Enforcers” possessed, carried, brandished, used and discharged firearms to protect the leaders and members of the drug trafficking organization, the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy.

Enforcers often acted upon instructions given by the leaders of this organization, to include incarcerated leaders. Enforcers would often provide protection to the drug trafficking organization's drug distribution points.

15. "Runners" generally worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for providing sufficient narcotics to the sellers for further distribution at the drug point. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make sure that there were street sellers for every shift of the drug point. They would make schedules and prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug point. At various times, they would be responsible for recruiting street sellers and additional runners. Runners had a supervisory role within the conspiracy, as they would directly supervise on a daily basis the activities of multiple sellers, and the daily activities of the drug points.

16. Sellers would distribute street quantity amounts of heroin, crack cocaine, cocaine and marijuana. Sellers were accountable for the drug proceeds and the narcotics sold at the drug distribution points. At times, sellers would use two-way radios ("walkie-talkies", "scanners") in order to communicate with other members of the organization.

17. "Facilitators" would serve as lookouts at times and at times would allow the use of their residences in order to process, store, and package narcotics, paraphernalia, firearms and ammunition.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A), 846, and 860.

COUNT TWO

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(i) and 860
(*Possession with Intent to Distribute / Distribution of Heroin*)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
- [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
- [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,
- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,
- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,

[32] JAY PAGES-PACHECO,
[33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
[34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
[35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
[36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
[37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
[38] JONATHAN VAZQUEZ-BOTA,
A/K/A MAMA DEO/JONA,
[39] WILSON BERRIOS-FLORES, A/K/A PANDA,
[40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
[41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
[42] KEVIN COSME-RIVERA,
[43] JOSUE PEREZ-TORRES, A/K/A AGUJA,
[44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,
[45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
[46] ALEXIS APONTE-NEGRON,
[47] CORAL GONZALEZ-BACENET,
[48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
[49] ARTURO DE LAHONGRAIS-EMMANUELLI,
[50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
[51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
[52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
[53] WANDA VARGAS-ALVAREZ,
[54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
[55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
[56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
[57] JAYSON CAMACHO-RODRIGUEZ,
[58] MARIA MERCADO-CRESPO, A/K/A LULY,
[59] JADIRA BAEZ-FLORES, AND
[60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute and distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public

Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A)(i) and 860 and Title 18, U.S.C. § 2.

COUNT THREE

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(iii) and 860
(*Possession with Intent to Distribute/Distribution of Cocaine Base*)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
- [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
- [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,
- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,
- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,

- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,
- [32] JAY PAGES-PACHECO,
- [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
- [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
- [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
- [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
- [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
- [38] JONATHAN VAZQUEZ-BOTA,
- A/K/A MAMA DEO/JONA,
- [39] WILSON BERRIOS-FLORES, A/K/A PANDA,
- [40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
- [41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
- [42] KEVIN COSME-RIVERA,
- [43] JOSUE PEREZ-TORRES, A/K/A AGUJA,
- [44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,
- [45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
- [46] ALEXIS APONTE-NEGRON,
- [47] CORAL GONZALEZ-BACENET,
- [48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
- [49] ARTURO DE LAHONGRAIS-EMMANUELLI,
- [50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
- [51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
- [52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
- [53] WANDA VARGAS-ALVAREZ,
- [54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
- [55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
- [56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
- [57] JAYSON CAMACHO-RODRIGUEZ,
- [58] MARIA MERCADO-CRESPO, A/K/A LULY,
- [59] JADIRA BAEZ-FLORES, AND
- [60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, aiding and abetting one another, did knowingly and intentionally

possess with intent to distribute and distribute two hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (Crack), a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A)(iii) and 860 and Title 18, U.S.C. § 2.

COUNT FOUR

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii) and 860
(Possession with Intent to Distribute/Distribution of Cocaine)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
- [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
- [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,
- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,
- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,

- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,
- [32] JAY PAGES-PACHECO,
- [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
- [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
- [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
- [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
- [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
- [38] JONATHAN VAZQUEZ-BOTA,
- A/K/A MAMA DEO/JONA,
- [39] WILSON BERRIOS-FLORES, A/K/A PANDA,
- [40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
- [41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
- [42] KEVIN COSME-RIVERA,
- [43] JOSUE PEREZ-TORRES, A/K/A AGUJA,
- [44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,
- [45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
- [46] ALEXIS APONTE-NEGRON,
- [47] CORAL GONZALEZ-BACENET,
- [48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
- [49] ARTURO DE LAHONGRAIS-EMMANUELLI,
- [50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
- [51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
- [52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
- [53] WANDA VARGAS-ALVAREZ,

[54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
 [55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
 [56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
 [57] JAYSON CAMACHO-RODRIGUEZ,
 [58] MARIA MERCADO-CRESPO, A/K/A LULY,
 [59] JADIRA BAEZ-FLORES, AND
 [60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute and distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of a real property comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A)(ii) and 860 and Title 18, U.S.C. § 2.

COUNT FIVE

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(vii) and 860
(Possession with Intent to Distribute/Distribution of Marijuana)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

[1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
 [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
 [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
 [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,

- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,
- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,
- [32] JAY PAGES-PACHECO,
- [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
- [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
- [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
- [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
- [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
- [38] JONATHAN VAZQUEZ-BOTA,
- A/K/A MAMA DEO/JONA,
- [39] WILSON BERRIOS-FLORES, A/K/A PANDA,
- [40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
- [41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
- [42] KEVIN COSME-RIVERA,
- [43] JOSUE PEREZ-TORRES, A/K/A AGUJA,

[44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,
 [45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
 [46] ALEXIS APONTE-NEGRON,
 [47] CORAL GONZALEZ-BACENET,
 [48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
 [49] ARTURO DE LAHONGRAIS-EMMANUELLI,
 [50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
 [51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
 [52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
 [53] WANDA VARGAS-ALVAREZ,
 [54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
 [55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
 [56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
 [57] JAYSON CAMACHO-RODRIGUEZ,
 [58] MARIA MERCADO-CRESPO, A/K/A LULY,
 [59] JADIRA BAEZ-FLORES, AND
 [60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute and distribute one hundred (100) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of a real property comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A)(vii) and 860 and Title 18, U.S.C. § 2.

COUNT SIX

21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(vi) and 860
(Possession/Distribution of Fentanyl)

From in or about 2016, and continuing up to and until the return of the instant Indictment, in the Municipalities of Ponce, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [2] JOSE A. CUSTODIO-COLON, A/K/A GILLIGAN/EL VIEJO,
- [3] CHRISTOPHER ROMAN-MEDINA, A/K/A KEKE,
- [4] ARMANDO ORTIZ-MELENDEZ, A/K/A YOKAIN,
- [5] NESTOR MURRAY-VALENTINO, A/K/A VALENTINO,
- [6] NICKY COSME-RIVERA, A/K/A MELLAO,
- [7] HECTOR PACHECO-FIGUERAS, A/K/A LA H,
- [8] JOSHUA ALMODOVAR, A/K/A MAMAITO,
- [9] ORLANDO COIMBRE-ECHEVARRIA, A/K/A ORLANDITO,
- [10] GIOVANNI VARGAS-MALDONADO, A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [12] RAYMOND TORRES-ZAYAS, A/K/A MACHO,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [14] LUIS LABOY-NADAL, A/K/A MARLON/MAILON,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO-RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [19] JOMAR IRRIZARRY-SARRIERA,
- [20] NORBERTO MARTINEZ-CASTRO, A/K/A BERTO/BERTITO/ENANO,
- [21] EDUARDO NEGRON-PEREZ, A/K/A BEBO,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [24] KELVIN ALMODOVAR-TORO, A/K/A CALVO,
- [25] JAIME PADILLA-GOMEZ, A/K/A JIMITO,
- [26] RAFAEL ALERS-ORTIZ, A/K/A MEMIN,
- [27] JOSE A. CUSTODIO-FLORES, A/K/A GELE,
- [28] JAI LOPEZ-DIAZ, A/K/A CHAI,
- [29] LUIS J. ALVARADO-DE LA CRUZ, A/K/A JOEL,
- [30] JOSHUA RODRIGUEZ-CORTEZ, A/K/A MEDUSA/VERSACE,
- [31] VILMA J. VAZQUEZ-VARGAS, A/K/A JANET,

[32] JAY PAGES-PACHECO,
 [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
 [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
 [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
 [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
 [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO,
 [38] JONATHAN VAZQUEZ-BOTA,
 A/K/A MAMA DEO/JONA,
 [39] WILSON BERRIOS-FLORES, A/K/A PANDA,
 [40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
 [41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,
 [42] KEVIN COSME-RIVERA,
 [43] JOSUE PEREZ-TORRES, A/K/A AGUJA,
 [44] ANGEL SANTANA-PACHECO, A/K/A GOLDO,
 [45] WILLIAM RAMOS-RIVERA, A/K/A WILLY,
 [46] ALEXIS APONTE-NEGRON,
 [47] CORAL GONZALEZ-BACENET,
 [48] ANTHONY LIMARDO-MERCADO, A/K/A MARIACHI,
 [49] ARTURO DE LAHONGRAIS-EMMANUELLI,
 [50] SILVERIO YOGUEZ-MERCADO, A/K/A GRINGO,
 [51] JOVELYN MARQUEZ-RUIZ, A/K/A LA FLACA,
 [52] MANUEL ALICEA-ALICEA, A/K/A ALICEA,
 [53] WANDA VARGAS-ALVAREZ,
 [54] JAIME MENDEZ-ORTIZ, A/K/A JIMMY,
 [55] ANGEL MERCADO-ACABEO, A/K/A CANO/CANITO
 [56] ILIA MARTINEZ-PAGAN, A/K/A CORAL/CHARLOT,
 [57] JAYSON CAMACHO-RODRIGUEZ,
 [58] MARIA MERCADO-CRESPO, A/K/A LULY,
 [59] JADIRA BAEZ-FLORES, AND
 [60] JOSE CAMBRELEN-PABON, A/K/A BUBA,

the defendants herein, aiding and abetting one another, did knowingly and intentionally, possess with intent to distribute and distribute four hundred (400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) - 4-piperidinyl] propanamide (fentanyl) or one hundred (100) grams or more of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule I Controlled Substance,

within one thousand (1,000) feet of a real property comprising the Arístides Chavier Arévalo Public Housing Project, the Ernesto Ramos Antonini Public Housing Project, the Dr. Manuel de la Pila Public Housing Project, the Ponce Housing Public Housing Project, and Hogares de Portugues Public Housing Project, all public housing facilities owned by a public housing authority.

All in violation of Title 21, U.S.C. §§ 841(a)(1) & (b)(1)(A)(vi) and 860 and Title 18, U.S.C. § 2.

COUNT SEVEN

18 U.S.C. § 924(c)(1)(A)

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

From at least in or about 2016 and continuing up to and until the date of the return of the instant Indictment, in the Municipality of Ponce, in the District of Puerto Rico, elsewhere, and within the jurisdiction of this Court,

- [1] ARMANDO L. ALICEA-SANTIAGO, A/K/A LA MAMI/ÑAÑITO,
- [10] GIOVANNI VARGAS-MALDONADO A/K/A JOVA/LA J,
- [11] JON ALVARADO-HERNANDEZ, A/K/A JACOB,
- [13] EDUARDO APONTE TORRES, A/K/A EDU/MENOR/BUBU,
- [15] JUAN LIMARDO-MELENDEZ, A/K/A JONNY,
- [16] JOSE MENDEZ-MORALES, A/K/A HUGO BOSS/GORDO,
- [17] BRYANT SANTIAGO RAMIREZ, A/K/A BRYANT,
- [18] EDGARGO CARABALLO-ECHEVARRIA, A/K/A LA J,
- [22] ADAM MALDONADO-SANTUCHE,
- [23] JOSE VAZQUEZ-VARGAS A/K/A GORDO JANET,
- [32] JAY PAGES-PACHECO,
- [33] HECTOR J. ORENGO-TORRES, A/K/A JAVI,
- [34] RAMON ECHEVARRIA-CARABALLO, A/K/A ARABE,
- [35] JOSE RODRIGUEZ-CASIANO, a/k/a Jose Rodriguez-Casiano/Jon Z,
- [36] WILLIAM GONZALEZ-MALDONADO, A/K/A CASQUI,
- [37] MIGUEL ORTIZ-GONZALEZ, A/K/A SACA MOSTRO
- [38] JONATHAN VAZQUEZ-BOTA, A/K/A MAMA DEO/JONA
- [39] WILSON BERRIOS-FLORES, A/K/A PANDA,

[40] NEFTALY RIVERA-SANTIAGO, A/K/A TALY,
[41] MIGUEL ALEXANDER-BAEZ, A/K/A YOYO,

the defendants herein, aiding and abetting one another, did knowingly and unlawfully possess firearms, of unknown make and model, as that term is defined in 18 U.S.C. § 921(a)(3), in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is conspiracy to possess with intent to distribute and distribution of controlled substances, as charged in Counts One through Six of this Indictment, pursuant to Title 21, *United States Code*, Section 841(a)(1).

All in violation of Title 18 U.S.C. §§ 924(c)(1)(A) and 2.

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NARCOTICS FORFEITURE ALLEGATION

The allegations contained in Counts One to Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of the offense in violation of 21 U.S.C. §§ 841 and 846, set forth in Count One to Six of this Indictment, the defendants, shall forfeit to the United States, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to, the following: \$123,662,000.00.

If any of the property described above, as a result of any act or omission of the defendants:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

FIREARMS FORFEITURE ALLEGATION

The allegations contained in Count Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c). Upon conviction of the offense in violation of 18 U.S.C. § 924(c) as set forth in Count Seven of this Indictment, the defendants shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved or used in the commission of the offense.

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

TRUE BILL

FOREPERSON

Date: 5/22/2024.

W. STEPHEN MULDROW
United States Attorney



Alberto R. López-Rocafort
Assistant United States Attorney
Chief, Gang Section



R. Vance Eaton
Assistant United States Attorney



Héctor Siaca-Flores
Assistant United States Attorney